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VIA E-MAIL

Mark G. Davis, Esq.
Weil, Gotshal & Manges LLP
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Suite 900
Washington, D.C. 20005

Kevin G. Baer, Esq.
Office of Unfair Import Investigations
U.S. International Trade Commission
500 E Street S.W., Suite 401-A
Washington, D.C. 20436

Re: *Certain Electronic Devices with Multi-Touch Enabled Touchpads and Touchscreens*, Investigation No. 337-TA-714

Dear Messrs. Davis and Baer:

Pursuant to Order No. 8, Complainant Elan Microelectronics Corp. hereby provides its preliminary proposed constructions of the terms identified as requiring construction in this matter:

scanning the touch sensor	Measuring the values generated by a touch sensor to detect operative coupling and determining the corresponding positions at which the measurements are made
identify a first maxima in a signal corresponding to a first finger	Identify a first highest absolute value in the a first set of values derived from the coupling of a first finger with the touch sensor
identify a minima following the first maxima	Identify a lowest absolute value that follows the first maxima
identify a second maxima in a signal corresponding to a second finger following said minima	Identify a second highest absolute value in a set of values derived from the coupling of a second finger with the touch sensor that follows the minima
identify	Plain meaning

in response to	Plain meaning
pointing device click function	Plain meaning
control function	A function in response to contact with the touch sensor other than or in addition to movement of a cursor
means for scanning the touch sensor . . . (claim 18);	The function is scanning the touch sensor The corresponding structure is circuitry to measure changes in capacitance of sensor conductors, multiplexors, an analog to digital converter and a microcontroller and equivalents thereof
means for providing an indication of the presence of two fingers . . . (claim 18)	The function is providing an indication of the simultaneous presence of two fingers in response to identification of said first and second maxima. The corresponding structure is firmware or software that provides data indicating the presence of two fingers in response to the identification of two maxima and equivalents thereof
means for selecting an appropriate control function . . . (claim 19)	The function is selecting an appropriate control function based on a combination of a number of fingers detected, and amount of time said fingers are detected , and any movement of said fingers The disclosed structure is software or firmware that receives as inputs the number of fingers detected, the amount of time the fingers are detected and any movement of said fingers and selects an appropriate control function and equivalents thereof
means for detecting a distance . . . (claim 24)	The function is detecting a distance between the first and second maxima and equivalents thereof The corresponding structure is software or

	firmware that determines the distance between the location of the first maxima and the location of the second maxima and equivalents thereof
means for providing a click function . . . (claim 26);	<p>The function is providing a click function in response to the removal and reappearance of said second maxima within a predetermined period of time</p> <p>The corresponding structure is software or firmware that outputs a value corresponding to a click function in response to the removal and reappearance of the second maxima within a predetermined period of time and equivalents thereof</p>
means for calculating first and second centroids . . . (claim 30)	<p>The function is calculating first and second centroids corresponding to the first and second fingers</p> <p>The disclosed structure is firmware or software that calculates the centroids of the measured values corresponding to the first and second fingers and equivalents thereof</p>

Sincerely,

/s/ Sean P. DeBruine

Sean P. DeBruine

SPD:whm